

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

U.S. BANK ASSOCIATION, AS TRUSTEE	)	
FOR J.P. MORGAN MORTGAGE	)	
ACQUISITION TRUST 2006-NC1,	)	
ASSET BACKED PASS-THROUGH	)	
CERTIFICATES, SERIES 2006-NC1	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 515-CV-90
v.	)	
	)	
VERMONT MUTUAL INSURANCE	)	
COMPANY, CRAIG A. GEARY,	)	
ORESTES G. BROWN, ESQ.,	)	
METAXAS BROWN PIDGEON LLP	)	
ROBERT H. KIDNEY, and THOMAS P. GUNN,	)	
	)	
Defendants.	)	
	)	

**SPECIAL APPEARANCE AND MOTION OF DEFENDANTS ORESTES G. BROWN,  
ESQ. AND METAXAS BROWN PIDGEON LLP TO DISMISS PLAINTIFF'S  
COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

The defendants, Orestes G. Brown, Esq. and Metaxas Brown Pidgeon LLP, hereby submit this special appearance and move to dismiss the claims asserted against them in Plaintiff's Complaint for Declaratory Relief for lack of personal jurisdiction. In support, the defendants rely on the Memorandum of Law and Declaration of Orestes G. Brown, submitted herewith.

WHEREFORE, the defendants, Orestes G. Brown, Esq. and Metaxas Brown Pidgeon LLP, respectfully request that the claims against them in the above-numbered Complaint for Declaratory Relief be dismissed, with prejudice.

Respectfully submitted,

/s/

Orestes G. Brown, Esq.  
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Dated: June 19, 2015

/s/

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